

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

ROBERT SOKOLOVE, DAVID MCCARTHY,)
WILLIAM SHIELDS, and CITIZENS FOR)
REHOBOTH BEACH, a political action committee,))

Plaintiffs,)

v.)

Case No. 05-514 (KAJ)

CITY OF REHOBOTH BEACH, DELAWARE,)
and GREGORY FERRESE, individually and as)
Manager of the City of Rehoboth Beach, Delaware,)

Defendants.)

PLAINTIFFS INITIAL DISCLOSURES

Plaintiffs Robert Sokolove, David McCarthy, William Shields and Citizens for Rehoboth Beach hereby make their initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1).

A. Potential Witnesses

Plaintiffs believe the following individuals have knowledge regarding signs erected on public rights-of-way within the City of Rehoboth Beach, statements by representatives of the City of Rehoboth Beach regarding the removal of signs from City property or rights-of-way and/or the manner in which the City of Rehoboth Beach has enforced City Ordinance § 74-16:

Robert Sokolove
David McCarthy
William Shields
Joseph Hill
Walter Onizuk
David Murphy
Gregory Ferrese
Melissa E. Cargnino
Charles Silverstein
Scott W. Sterl

B. Documents in the Control of Defendant

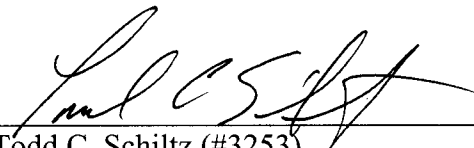
Other than the documents plaintiffs already have produced, the documents introduced as exhibits at the preliminary injunction hearing and the documents attached to the affidavits previously filed in this matter, plaintiffs have no documents in their possession, custody or control that they may use to support their claims.

C. Computation of Damages

Plaintiffs has not calculated their damages, which include the attorney fees and other expenses incurred in this suit.

D. Insurance Agreements

None.



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Attorneys for Plaintiffs

Date: October 20, 2005

CERTIFICATE OF SERVICE

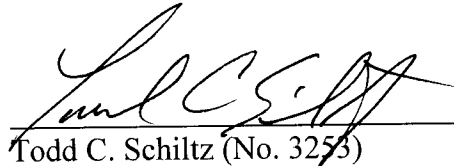
I, Todd C. Schiltz, hereby certify that on October 20, 2005, a copy of the Plaintiff's Initial Disclosures was served upon the following counsel of record:

BY HAND-DELIVERY

Daniel A. Griffith, Esquire
Marshall, Dennehey, Warner, Coleman & Goggin
1220 North Market Street, 5th Floor
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Wilmington, DE 19899-8888

BY FIRST-CLASS MAIL

Walter W. Speakman, Jr., Esquire
Brown, Shiels, Beauregard & Chasanov
108 East Water Street
P.O. Drawer F
Dover, DE 19903



Todd C. Schiltz (No. 3253)

DATED: October 20, 2005